

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

ROGER KNOX,

Defendant.

CRIMINAL NO. 18-CR-10385-NMG

**JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5(A), the parties hereby file the following status report prepared in connection with the Initial Status Conference that is currently scheduled for December 17, 2018, although the parties, respectfully, do not believe that there is a need for an in-person conference at this time.

**(1) Automatic Discovery/Pending Discovery Requests**

The Government provided automatic discovery in this case on multiple occasions. First, the Government provided arrest reports, Court process, and recorded telephone calls and text messages on or about November 14, 2018. Then, on December 6, 2018, the Government provided counsel with a copy of the Government's Relativity database containing e-mails and other records. Defendant is currently reviewing this discovery.

**(2) Additional Discovery**

The Government does anticipate providing some additional discovery as it comes in – this discovery will include any forensic data from devices used by Defendant, MLAT returns, and other

discovery that is obtained during the course of this investigation. The defense reserves the right to file a discovery motion.

**(3) Timing of Additional Discovery Requests**

The defense is reviewing the discovery provided by the Government. At this time, the defense reserves the right to file an additional discovery request by April 1, 2019, with the Government's response due 21 days later.

**(4) Protective Orders**

There are no protective orders currently in place. Should a party seek a protective order or modification of any existing protective order, a motion will be filed with the Court to address any issue.

**(5) Pretrial Motions**

It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

**(5) Status**

Defense counsel needs additional time to review the extensive discovery and discuss issues with his client.

**(6) Expert Discovery**

The Government agrees to provide any expert witness disclosures 30 days prior to trial. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

**(7) Speedy Trial Act**

The parties have conferred and ask that the Court exclude the period of time from the time of the initial status conference on December 17, 2018 to the time of the next status conference,

which the parties believe should be set for after April 1, 2019. This will provide the defense with time to review the discovery and confer with his client.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

/s/ William H. Connolly  
WILLIAM H. CONNOLLY  
Attorney for ROGER KNOX

By: /s/ Eric S. Rosen  
ERIC S. ROSEN  
Assistant U.S. Attorney

Dated: December 13, 2018

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing upon all counsel of record by electronic filing notice.

/s/ Eric S. Rosen  
ERIC S. ROSEN  
Assistant U.S. Attorney

Dated: December 13, 2018